

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LEONCIO ELIZARRI, DEXTER SMITH,	)	
THOMAS HAUGABOOK,	)	
AARON MAGALANES, individually and for a	)	
class	)	
Plaintiffs,	)	07 C 2427
	)	
vs.	)	Honorable Judge
	)	Joan Gottschall
SHERIFF OF COOK COUNTY AND	)	
COOK COUNTY, ILLINOIS,	)	Magistrate Judge Soat Brown
	)	
Defendants.	)	

## **DEFENDANTS' MOTION FOR A PROTECTIVE ORDER**

NOW COMES the Defendants, SHERIFF OF COOK COUNTY AND COOK COUNTY, ILLINOIS, by their attorney ANITA ALVAREZ, State's Attorney of Cook County, through MICHAEL J. SORICH and MARY MCCLELLAN, Assistant State's Attorneys, and hereby moves this Honorable Court for a Protective Order pursuant to Rule 26 (c) of the Federal Rules of Civil Procedure.

On March 11, 2013 Assistant State's Attorney Michael Sorich emailed a proposed Protective Order to Plaintiffs' counsels Thomas Morrissey and Ken Flaxman. The undersigned counsel sent another email to Plaintiffs' counsels on March 13, 2013, in an attempt to submit an agreed order pursuant to this Court's standing orders. March 18, 2013 undersigned counsel spoke with Plaintiffs' counsel Ken Flaxman telephonically in an attempt to agree on the Protective Order, but counsels were unable to resolve their differences. Therefore, in accordance

with Local Rule 37.2, Defendants bring said motion and in support thereof, Defendants state as follows:

1. Plaintiffs requested in a Request for the Production of Documents to Defendants copies of inventory slips at the Cook County Jail, including CDs which contain a database of scanned inventory slips.
2. Defendants request this Court for a Protective Order to ensure that the production of documents, which contain the names and information of detainees that are or were confined at the Cook County Jail, CDs and personal property inventory receipts is strictly maintained during the course of this litigation.
3. That Defendants further assert that any and all documents and CDs as referenced above shall be construed as confidential under the requested Order and shall be used solely for the preparation for and use in this litigation and shall not be used or disclosed by any person receiving such information for any purpose whatsoever.
4. The protected information shall be disseminated to the attorneys of record, their staff, experts retained in this litigation and this Court; at the end of discovery said materials are to be returned to Defendants' counsels.
5. If the protected information is filed with this Court, it shall be submitted under seal and will not become part of the public file.
6. Please see attached Protective Order marked as Exhibit A should this Honorable Court grant the Defendants' motion.

**WHEREFORE** Defendants respectfully requests:

1. That this Honorable Court enter a Protective Order attached as Exhibit A;
2. That this Honorable Court grant any other relief it deems just.

Respectfully Submitted,

ANITA ALVAREZ  
State's Attorney of Cook County

By: /s/Michael J. Sorich  
Michael J. Sorich  
Assistant State's Attorney  
Torts/Civil Rights Litigation Section  
500 Richard J. Daley Center  
Chicago, IL 60602  
(312) 603-5170